

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

TYCO FIRE PRODUCTS LP,

Plaintiff,

v.

AIU INSURANCE COMPANY, *et al.*

Defendants.

Civil Action No. 2:23-cv-02384-RMG

Hon. Richard M. Gergel

JOINT MOTION TO DISMISS ALLSTATE

Pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiff Tyco Fire Products LP (“Tyco”), and Defendant Allstate Insurance Company, as successor in interest to Northbrook Excess and Surplus Insurance Company, formerly known as Northbrook Insurance Company (“Allstate”), stipulate and jointly move for an unopposed order of dismissal as follows:

1. By letter dated February 6, 2024, Tyco and Allstate gave notice that they had reached a settlement-in-principle of Tyco’s claims in this action. ECF 236.
2. Tyco and Allstate have now finalized their settlement agreement.
3. Accordingly, Tyco and Allstate jointly request that the Court enter an order dismissing Tyco’s claims against Allstate with prejudice in the form substantially similar to the enclosed **Proposed Order**.
4. Tyco and Allstate understand that no other party to this action opposes this motion.

Dated: March 28, 2024

WILLS MASSALON & ALLEN LLC

By: s/Carmela E. Mastrianni

Carmela E. Mastrianni, SC Fed. ID. 13730
M. Aaron Lay, *Pro Hac Vice*
525 N. Tryon Street, Suite 1400
Charlotte, NC 28202
Telephone: (704) 344-1117
Facsimile: (704) 344-1483
cmastrianni@lawhssm.com
malay@lawhssm.com

By: s/Christy Ford Allen

Christy Ford Allen (Fed. No. 07549)
Post Office Box 859
Charleston, South Carolina 29402
T: (843) 727-1144
callen@wmalawfirm.net

COVINGTON & BURLING LLP

Allan B. Moore (*pro hac vice*)
Alexis N. Dyschkant (*pro hac vice*)
Timothy D. Greszler (*pro hac vice*)
850 Tenth Street, NW
Washington, DC 20001
T: (202) 662-5575
abmoore@cov.com
adyschkant@cov.com
tgreszler@cov.com

Counsel for Allstate Insurance Company

Counsel for Tyco Fire Products LP